

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:  
  
AMADIGNA ORENGO ORENGO  
  
\_\_\_\_\_  
DEBTOR

CASE NO 17-01920 EAG  
  
CHAPTER 13

**NOTICE OF MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD:**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action n who objects to the relief sought herein, shall serve, and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

TO THE HONORABLE COURT:

Elbia Vázquez Dávila, the Undersigned, hereby moves this Court for leave to withdraw as Counsel of record for the DEBTOR in the above-styled matter. In support of this motion, the Undersigned states and prays as follows:

1. The appearing counsel will be out of the jurisdiction during several months and will be unable to continue representation of the Debtor in the above-styled matter.
2. Under Local Rule of Bankruptcy Procedure 9010-1 an attorney representing a Debtor may withdraw from a case:
  - a) Without leave of Court, by filing and serving a Notice of Withdrawal, when all the requirements set forth in subparagraph (A) are met.

- b) With the Court's Permission, by filing and serving a Motion for Leave to Withdraw under 9010-1 (C), when any of the requirements set forth in subparagraph (A) are lacking.
- 3. This Motion is filed under Local Rule of Bankruptcy Procedure 9010-1(C)
- 4. Regarding the above-styled case, the Undersigned hereby certifies that:
  - a) Debtor has been informed, by letter and by phone, of the Undersigned's intention to withdraw as its Counsel. Debtor has also been advised of all pending matters or hearings in the above-styled case.
  - b) At the moment, aside from the present Motion, there are no Motions pending before this Court and no trial or hearing date for a related matter has been scheduled.
  - c) Debtor has been informed that the Undersigned Counsel will remain as attorney of record in the case and/or proceeding until the court enters an order granting the withdrawal, which the Undersigned will accordingly serve on the Debtor.
  - d) Debtor has been informed of his right to continue this proceeding pro-se.

WHEREFORE, Premises considered, the Undersigned hereby requests that this Honorable Court enter an Order granting her Leave to Withdraw as Attorney for the Debtor in the above-styled matter and:

- a) Provides the Debtor with a reasonable time to decide, based on the information provided by Counsel, whether to continue this proceeding pro-se or find adequate legal representation; and
- b) For an order continuing or postponing any other actions in this case, as it deems just and proper.

Respectfully submitted in San Germán, Puerto Rico on July 27, 2021.

/s/Elbia I. Vázquez Dávila  
ELBIA I. VAZQUEZ DAVILA, Esq.

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the participants of the system and by regular mail to all interested parties as per attached list, and to the following:

- A. To Debtor, Amadigna Orengo Orengo by regular mail to its mailing address of record.
- B. To the Trustee assigned to this Case, José R. Carrión, by Regular Mail to its address of Record.
- C. To US Trustee, Monsita Lecaroz Arribas, by Regular Mail to Edificio Ochoa 500 Tanca Street, Suite 301, San Juan PR 00901-1922.

In San Germán, Puerto Rico, this July 27, 2021.

/s/Elbia I. Vázquez Dávila  
ELBIA I. VAZQUEZ DAVILA, Esq.  
USDC #208810  
CALLE PRINCIPAL #21, URB. EL RETIRO  
SAN GERMAN PR 00683  
TEL. 892-0300/892-0310 Fax 1-888-630-4498  
Email: evazquezdavila@yahoo.com